

EXHIBIT H

GIBSON DUNN

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October 13, 2012

VIA ELECTRONIC MAIL

Larry R. Veselka, Esq.
Smyser Kaplan & Veselka, LLP
Bank of America Center
700 Louisiana, Suite 2300
Houston, Texas 77002

Re: Subpoenas to Google and Yahoo! in *Chevron Corp. v. Donziger*,
No. 11-civ-0691 (S.D.N.Y.)

Dear Larry:

This letter follows up on our recent discussions. On October 3, 2012, I sent you an email letting you know that Chevron was amenable to extending the deadline for response to the subpoenas served on Google and Yahoo! in order to try to narrow the scope of the information requested with respect to account users that you represent.

Because you did not respond to that email, we were surprised to learn that you filed a motion to quash on Friday, October 5, 2012.

As I said in my October 9 voicemail, and again when we spoke earlier this week, your motion is based on a flawed reading of Chevron's subpoenas. Chevron's subpoenas seek information from the email service providers regarding specific email accounts connected with the activities and events at issue in *Chevron Corp. v. Donziger*, No. 11-civ-0691 (S.D.N.Y.). These subpoenas include routine requests for user account information and IP logs. The subpoenas, moreover, do not call for the production of email content or internet searches. Further, Chevron's document requests apply only to responsive information available as of the date of the request. As a result, the claims raised in your motion to quash are unfounded.

We suggest again that you withdraw your motion to quash, given that it is based on an incorrect reading of the subpoena. We remain willing to discuss the specific date ranges that you believe should be applied for each of the email accounts. Please let me know whether you are willing to withdraw the currently pending motion by no later than 5:00 p.m. Eastern on Wednesday, October 17.

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Larry R. Veselka, Esq.
October 13, 2012
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Sincerely,

A handwritten signature in blue ink that reads "Howard".

Howard S. Hogan

HSH/rg